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Attorneys for Plaintiff, Eric Hines

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ERIC HINES, v. GARY M. LANIGAN, et al., Defendants.))))))	Civil Action No. 17-2864 (NLH) (MJS) NOTICE OF PLAINTIFF'S MOTION FOR PRO HAC VICE <u>ADMISSION OF CO-COUNSEL</u> DOCUMENT FILED ELECTRONICALLY RETURN DATE: Date to be set by the Court
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TO: Marvin L. Freeman
State of New Jersey
Office of the Attorney General
25 Market Street
P.O. Box 112
Trenton, NJ 08625
marvin.freeman@law.njoag.gov
Counsel for Defendants

PLEASE TAKE NOTICE that on a date and time to be set by the Court, the undersigned, attorney for Plaintiff Eric Hines (“Plaintiff”), shall appear before the Honorable Noel L. Hillman, U.S.D.J., **Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey, 08101**, and shall move this Court for entry of an Order pursuant to Local Civil Rule 101.1(c) admitting Keith Altman, Esq., member in good standing of the bars of the states of California and Michigan, as counsel *pro hac vice* in this matter.

PLEASE TAKE FURTHER NOTICE that in support of their Motion, Plaintiff shall rely upon the Application and Certification of Joseph D. Lento, Esq., and Declaration of Keith Altman, Esq. A proposed form of Order is also submitted for the Court’s consideration.

PLEASE TAKE FURTHER NOTICE that Plaintiff hereby requests that their application be considered for a ruling on papers only as counsel for Plaintiff held a meet and confer with counsel for Defendants on May 13, 2022, and they have expressed no opposition to the Motion.

Dated: May 13, 2022

Respectfully submitted,

By: /s/ Joseph D. Lento
Joseph D. Lento, Esq.
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STATEMENT IN LIEU OF BRIEF PURSUANT TO L.CIV.R. 7.1(c)(1)

Pursuant to Local Civil Rule 7.1(c)(1), Plaintiffs submit this Statement in lieu of the submission of a formal brief in support of their application for the admission *pro hac vice* of co-counsel. Inasmuch as the admission of counsel *pro hac vice* under the terms of Local Civil Rule 101.1(c) is a matter within the sound discretion of the Court, and until any opposition to the within motion is filed with the Court by defendant herein, it is respectfully submitted that no brief in support of the within motion is necessary at this time.

Dated: May 13, 2022

Attorneys for Plaintiff,

/s/ Joseph D. Lento
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Attorneys for Plaintiff, Eric Hines

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ERIC HINES, v. GARY M. LANIGAN, et al., Defendants.) Civil Action No. 17-2864 (NLH) (MJS) Plaintiff,) APPLICATION AND CERTIFICATION OF JOSEPH D. LENTO IN SUPPORT OF THE PRO HAC VICE ADMISSION OF CO-COUNSEL))) DOCUMENT FILED ELECTRONICALLY)
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JOSEPH D. LENTO, of full age, hereby certifies as follows:

1. I am the president of the law firm Lento Law Group, P.C., 3000 Atrium Way, Suite 200, MT. Laurel, New Jersey 08054. I am admitted to practice before the Courts of the State of New Jersey, the United States District Court for the District of New Jersey, and the State of Pennsylvania. I am a member in good standing in each of these bars. I presently am not the subject of any disbarment or suspension proceeding before this or any

Court. I consented to a one-year suspension of my Pennsylvania Bar license in 2013 and the New Jersey Bar thereafter imposed reciprocal retroactive discipline after recommending a reprimand. The Eastern District of Pennsylvania in 2013 imposed an administrative suspension in response to my PA Bar consent suspension.

2. I submit this Certification in support of the application by Plaintiff Eric Hines, for admission *pro hac vice* of Keith Altman, Esq. of the law firm Law Office of Keith Altman, 33228 West 12 Mile Road, Suite 375, Farmington Hills, MI 48334, to appear in this action as co-counsel for Plaintiff.

3. Pursuant to Local Civil Rule 101.1, I understand that all pleadings, briefs, stipulations, and other papers filed with the Court shall be signed by or for me or another attorney associated with Lento Law Group, P.C. Further, I agree to promptly notify the attorneys admitted *pro hac vice* of the receipt of all notices, Orders and pleadings.

4. On behalf of Plaintiff, I respectfully request that the Court grant its application to have Keith Altman, Esq., admitted *pro hac vice* to appear and participate as their co-counsel in this matter pursuant to Local Civil Rule 101.1(c).

Dated: May 13, 2022

/s/ Joseph D. Lento
Joseph D. Lento, Esq.